

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

TECHTRONIC INDUSTRIES COMPANY
LIMITED,

Plaintiff,

– against –

MUDDY WATERS CAPITAL LLC, and
MW DOMINO MANAGEMENT LLC,

Defendants.

Case No. 1:25-cv-00249

JOINT SCHEDULING RECOMMENDATIONS

The parties recommend that the following deadlines be entered in the scheduling order to control the course of this case:

1. The parties must mediate this case on or before September 30, 2025 and file a report in accordance with Rule 88 after the mediation is completed.
2. The parties asserting claims for relief shall submit a written offer of settlement to opposing parties by August 29, 2025, and each opposing party shall respond, in writing, by September 12, 2025.
3. The parties shall file all motions to amend or supplement pleadings or to join additional parties by October 3, 2025.
4. All parties asserting claims for relief shall file their designation of potential witnesses, testifying experts, and proposed exhibits, and shall serve on all parties, but not file the materials required by Fed. R. Civ. P. 26(a)(2)(B) by January 30, 2026. Parties resisting claims for relief shall file their designation of potential witnesses, testifying experts, and proposed exhibits,

and shall serve on all parties, but not file the materials required by Fed. R. Civ. P. 26(a)(2)(B) by March 17, 2026. All designations of rebuttal experts shall be designated within 14 days of receipt of the report of the opposing expert.

5. An objection to the reliability of an expert's proposed testimony under Federal Rule of Evidence 702 shall be made by motion, specifically stating the basis for the objection and identifying the objectionable testimony, within 30 days of receipt of the written report of the expert's proposed testimony, or within 30 days of the expert's deposition, if a deposition is taken, whichever is later.

6. The parties shall complete all fact discovery on or before January 16, 2026. The parties shall complete all expert discovery on or before April 17, 2026. Counsel may by agreement continue discovery beyond the deadline, but there will be no intervention by the Court except in extraordinary circumstances, and no trial setting will be vacated because of information obtained in post-deadline discovery.

7. All dispositive motions shall be filed no later than June 5, 2026. Dispositive motions as defined in Local Rule CV-7(c) and responses to dispositive motions shall be limited to twenty (20) pages in length. Replies, if any, shall be limited to ten (10) pages in length in accordance with Local Rule CV-7(e). If the parties elect not to file dispositive motions, they must contact the courtroom deputy on or before this deadline in order to set a trial date.

8. If required, a hearing on dispositive motions will be set by the Court after all responses and replies have been filed.

9. The Court will set the case for trial by separate order. The order will establish trial type deadlines to include pretrial matters pursuant to Local Rule CV-16(e)-(g).

10. All of the parties who have appeared in the action conferred concerning the contents of the proposed scheduling order on June 12, 2025 and the parties have agreed as to its contents.

11.

Dated: June 13, 2025.

/s/ Asher B. Griffin

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CERTIFICATION OF SERVICE

I certify that on June 13, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

VIA E-MAIL

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